

# **Exhibit F**

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Washington, DC 20036



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A LIMITED LIABILITY PARTNERSHIP

January 13, 2023

**VIA ELECTRONIC MAIL**

Sarah R. London  
Lief Cabraser Heimann & Bernstein, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339

**Re: *In re: JUUL Labs, Inc. Marketing, Sales Practices & Product Liability Litigation*, Case No. 19-md-02913; *San Francisco Unified School District v. JUUL Labs, Inc., et al.*, No. 3:19-cv-08177**

Dear Counsel:

Pursuant to the parties' agreement regarding the exchange of pretrial materials, ECF No. 3743, Defendants Altria Group, Inc., Philip Morris USA Inc., Altria Client Services LLC, and Altria Group Distribution Company (the "Altria Defendants") provide below a list identifying the witnesses whom the Altria Defendants currently expect they are more likely to call at trial either live or by deposition designation, based on the information available to the Altria Defendants at this time.<sup>1</sup>

The witnesses below are listed in alphabetical order in their respective categories, and the Altria Defendants make no representation that such witnesses, if called to testify, will be called in the order set forth herein. The Altria Defendants reserve all rights to supplement or amend this list, including but not limited to, the right to:

- A. Call witnesses at trial, in their case-in-chief or otherwise, not included on this list, or to include additional or different witnesses on any list submitted to the Court.
- B. Supplement and/or amend this list in light of any discovery, including depositions, that has not yet been completed.
- C. Supplement and/or amend this list in light of the evidence elicited at trial.
- D. Supplement and/or amend this list in light of Plaintiff's proposed exhibit list, deposition designations, or witness lists.

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<sup>1</sup> This witness list relates only to the *SFUSD* case, and the Altria Defendants reserve the right to identify and call different witnesses in all other cases.

- E. Supplement and/or amend this list in light of the Court's ruling on any pre-trial motions, including motions *in limine*, filed in this action.
- F. Supplement and/or amend this list in light of witnesses' availability or status under the Federal Rules of Civil Procedure.
- G. Not call any of the persons listed below.
- H. Rely on the testimony of or call any witness identified or called by another party.
- I. Question the persons listed below about any topics that are the subjects of testimony by witnesses called by Plaintiff.
- J. Call or introduce testimony from any witness deemed necessary for impeachment or rebuttal purposes, whether or not previously identified herein.
- K. Submit as evidence deposition testimony taken in this matter, regardless of whether the deponent is listed below, in accordance with the parties' agreed upon designation process.
- L. Rely upon deposition testimony affirmatively designated by Plaintiff or Altria for any witness as counter-designated deposition testimony introduced in any party's case-in-chief.
- M. Call any witness, including witnesses not identified herein, to the extent necessary to support the admission of documents into evidence in the event a stipulation cannot be reached concerning the admissibility or authenticity of such documents.
- N. Use any available method at trial (i.e. live in-person testimony, live remote testimony, or deposition designation video), regardless of the classifications provided herein.

Ref. No.	Witness & Category
	Live
1	Bowen, Adam
2	Henningfield, Jack
3	Lakdawalla, Darius
4	Mefford, Larry

5	Monsees, James
6	Murphy, Kevin
7	Nelson, Cheryl
8	Pritzker, Nicholas
9	Rock, Ed
	<b>Live/Deposition</b>
10	Flora, Jason
11	Hunter, Jennifer
12	Pak, Quarry
	<b>Deposition<sup>2</sup></b>
13	Blaylock, Brian
14	Burns, Kevin
15	Frankel, Zach
16	Garnick, Murray
17	Gifford, William
18	Lee, Charlene
19	Longest, Kaitlin
20	Matthews, Vincent
21	Schroder, Steven
22	Xu, James

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<sup>2</sup> Given the length and uncertainty of Plaintiff's witness list, the Altria Defendants also identify William Gardner and Pascal Fernandez as may call deposition witnesses at this time.

23	Wallace, Meghan
24	Willard, Howard

Respectfully,



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*Counsel for Altria Defendants*

cc: Dean Kawamodo  
Dena C. Sharp  
Ellen Relkin